



## San Diego County Water Authority

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January 16, 2014

Peter Brostrom  
Water Use and Efficiency Branch  
Division of Statewide Integrated Water Management  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-001

Re: Independent Technical Panel Report

Dear Peter,

Please consider the Water Authority's following comments on the Independent Technical Panel Report:

1. Simplified Demand Management Measures

The Water Authority supports the need to update the demand management measures in the urban water management plan. The demand management measures have helped California provide a framework for advancing conservation in California. In 2009, with the adoption of SB x 7 7, California moved from an approach that prescribed cost effective demand management measures to one that established targets for a reduction in per capita water use. The proposed streamlined approach to demand management measures will ensure that the Urban Water Management Plans provide enough information to explain how conservation targets are being met, while at the same time moving away from prescribing how water suppliers will meet those targets.

As a correction, wholesale programs should not be required to include water waste prevention ordinances or conservation pricing since these do not apply to wholesalers due to a lack of authority and direct relationship with retail customers.

2. Water Loss Reporting

The Water Authority supports the concept of encouraging water agencies to implement leak loss programs including both monitoring of leak loss and proper system maintenance. While the American Water Works Association provides a tool that is helpful for retail agencies to assess leak loss, we believe that mandating use of this tool in statute is overly prescriptive. The AWWA manual is geared toward retail agencies and is not well suited for wholesale water agencies. Even with frequent meter calibration, the leak loss for a wholesaler can easily be

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within the meter error. Our approach to leak loss has been a preventative one which does not fit well within the AWWA manual. We recommend that any change in the statute should not specify the approach to leak loss assessment and management and that this information should be included in guidance that will have the flexibility to evolve over time.

3. Electronic Filing of Urban Water Management Plans

The Water Authority supports the electronic filing of Urban Water Management Plans and use of standardized forms, as long as the requirements are provided to water suppliers in a timely manner. In addition, we would appreciate being provided clear definitions regarding water supply categories and recognition of the differences between wholesale and retail agency supply reporting. We have already started developing the information for our 2015 Urban Water Management Plan and will begin drafting the plan in mid-2014 in order to meet the statutory deadline.

4. Voluntary Reporting on Savings from Codes, Standards and Ordinances

Incorporating savings from codes and standards into the urban water management plans could be helpful in assessing future water demands. However, the analysis to do this can be complex and time consuming. If this provision is enacted, we recommend that DWR engage a workgroup of water suppliers and other stakeholders to get input on the development of the guidance. This would help DWR develop guidance that is appropriate and practical for various size and types of water systems and would provide information on existing approaches and models used for demand forecasting.

5. Voluntary Inclusion of Energy Intensity in Urban Water Management Plans

In light of the recent Order 13-12-011 Granting Petition and Opening Rulemaking issued by the California Public Utilities Commission on December 30, 2013, it may be premature for DWR to issue guidance on the water-energy nexus as it relates to joint water and energy programs. The methodology that CPUC will use to authorize funding from energy efficiency programs for embedded energy savings has not been decided and could vary significantly from any guidance provided by DWR.

6. Avoided Costs

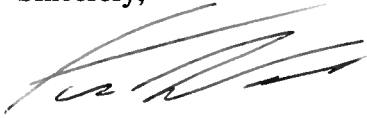
We appreciate that the ITP decided to not include avoided costs in the first draft report recommendations. Historically, calculation of avoided costs was used as a basis to waive the requirement for water suppliers to implement demand management measures when they are not locally cost effective. With the adoption of SBX 77, agencies are now required to meet conservation targets regardless of the cost effectiveness of demand management measures and this calculation is no longer needed. In addition, avoided cost cannot be the sole factor water agencies use for determining water supply options. Other factors

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include reliability, diversification, water quality and environmental considerations.

If you have any questions regarding the letter, please contact Toby Roy at (858)522-6743.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ken Weinberg', with a stylized, sweeping flourish extending from the end of the name.

Ken Weinberg  
Director of Water Resources